

APPENDIX A

INTERROGATORY NO. 19: Identify all individuals who participated in determining that Llera's work on Houlihan deal did not qualify her for a "large deal incentive" per the terms of the applicable sales incentive plan.

SUPPLEMENTAL ANSWER: ... Subject to and without waiving its objections, *see* Supplemental Response to Request for Production No. 24. Defendant further states, pursuant to Rule 33(d), that information responsive to Interrogatory No. 19 can be derived from documents produced, including: TM39385-TM38763.

REQUEST FOR PRODUCTION NO. 25: Produce all documents that indicate the “[REDACTED]” project described by Sandeep Thawani was placed in the “[REDACTED]” pillar or any other pillar (with respect to an applicable Sales Incentive Plan).

SUPPLEMENTAL RESPONSE: ... Subject to and without waiving its objections, *see* Supplemental Response to Request for Production No. 24 and documents previously produced, including: TM39385-38763.

REQUEST FOR PRODUCTION NO. 26: Produce copies of all documents indicating which T-Mobile contracts were placed in any particular pillar (with respect to any applicable Sales Incentive Plan).

SUPPLEMENTAL RESPONSE: ... Subject to and without waiving its objections, *see* Supplemental Response to Request for Production No. 24 and documents previously produced, including: TM39385-38763.

REQUEST FOR PRODUCTION NO. 27: Please produce copies of all documents where “pillar” is defined per the 2017 Sales Incentive Plan.” See, e.g. page 23 of Sandeep Thawani’s November 17, 2020 deposition.

SUPPLEMENTAL RESPONSE: ... Subject to and without waiving its objections, *see* Supplemental Response to Request for Production No. 24 and documents previously produced, including: TM39385-38763.